

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D. C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b), )  
Table of Allotments , )  
FM Broadcast Stations. )  
(Cross Hill, South Carolina) )

To: Chief, Allocations Branch

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**PETITION FOR RULE MAKING TO DELETE ALLOTMENT**

South Carolina Comex ("Comex") herein petitions for issuance of a Notice of Proposed Rule Making to delete the allotment Channel 231A at Cross Hill, South Carolina.

Channel 231A was allotted to Cross Hill, South Carolina pursuant to the Report and Order in MM Docket No. 96-126, DA 96-1453 (Chief, Allocations Branch, released September 6, 1996). Comex had contemplated filing an application for Channel 231A at Cross Hill. In the process of looking for a transmitter site, it became clear to Comex the allotment is defective. Specifically, there is no fully spaced site from which the proposed station will place a city-grade signal over a significant portion of the principal community. As the attached engineering statement of William A. Culpepper, a registered professional engineer, demonstrates, using the closest the possible fully-spaced site, a Class A station operating with maximum facilities would cover only 19.2% of Cross Hill with a city-grade signal. From the reference coordinates for

2.

the allotment, a Class A station operating with maximum facilities would cover only 10.8% of Cross Hill with a city-grade signal.

Under the circumstances, the technically deficient Cross Hill allotment does not serve the public interest. E.g., Eugene, Oregon, 10 FCC Rcd 9793 (Chief, Allocations Branch, 1995).

Accordingly, Comex urges the Commission to institute a rule making proceeding to delete Channel 231A at Cross Hill, South Carolina.

Respectfully submitted,

SOUTH CAROLINA COMEX

By 

Matthew H. McCormick

Its Counsel

Reddy, Begley & McCormick  
1001 22nd Street, N.W., Suite 350  
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(202) 659-5700

November 20, 1996

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CROSS HILL, SOUTH CAROLINA

ENGINEERING EXHIBIT

November 1996

William Culpepper & Associates, Inc.  
900 Jefferson Drive  
Charlotte, NC 28270

SOUTH CAROLINA COMEX  
CROSS HILL, SOUTH CAROLINA

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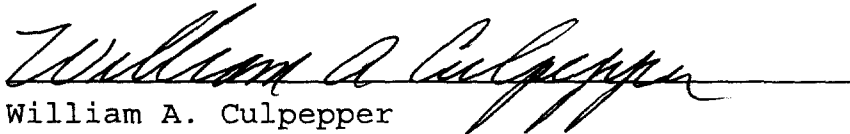
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CROSS HILL, SOUTH CAROLINA

DECLARATION

I declare, under penalty of perjury, that I have prepared the attached Engineering Exhibit for South Carolina Comex, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief; and that I am a Registered Professional Engineer in the State of North Carolina.

Executed on November 19, 1996.

A handwritten signature in dark ink, appearing to read "William A. Culpepper", written over a horizontal line.

William A. Culpepper  
900 Jefferson Drive  
Charlotte, NC 28270  
704-365-9995

SOUTH CAROLINA COMEX  
CROSS HILL, SOUTH CAROLINA

NARRATIVE

This exhibit supports the attached Petition for Rule Making to Delete Allotment. The purpose is to show that the allotment for channel 231A at Cross Hill, South Carolina does not meet the requirement of §73.315 because it is not possible to provide a 70 dBu signal over the principal community.

Figure 1 is a portion of the 1:24,000 scale USGS topographic map of Chappells, South Carolina. This map shows the extreme western portion of the "useable" area for channel 231A. Shown on this map are the preclusion lines to WMUU, channel 233C at Greenville, South Carolina and WGOR, channel 230C3 at Martinez, Georgia. The intersection of these two preclusion lines defines the closest point of approach (CPA) to Cross Hill. Also, Figure 1 shows the reference coordinates and a hypothetical site that is the approximate CPA to Cross Hill that meets the spacing requirements of §73.207. The coordinates of the CPA are 34°13'04" north and 81°51'41" west.

Figure 2 is a portion of the 1:24,000 scale USGS topographic map of Cross Hill. Shown on this map are the city boundary of Cross Hill and the 70 dBu contours from the reference site and the CPA site using 6 kilowatts and an antenna HAAT of 100 meters. The distances from the two sites to the 70 dBu contours are tabulated on pages 4 and 5. These distances have been calculated and plotted in one degree increments by the method outlined in §73.313, using the NGDC 30 second terrain data base.

A planimeter was used to measure the total area of Cross Hill and the coverage provided from the reference site and the CPA site. The coverage from the reference site is 10.8 per cent, while the coverage from the CPA site is 19.2 per cent.

This exhibit clearly demonstrates that it is not possible to provide the required 70 dBu signal strength coverage to Cross Hill with the channel 231A channel allotment, therefore this allotment should be deleted.

WILLIAM CULPEPPER & ASSOCIATES  
900 JEFFERSON DR - CHARLOTTE NC 28270

SOUTH CAROLINA COMEX  
CHANNEL STUDY FROM THE CROSS HILL REFERENCE COORDINATES

REFERENCE		DISPLAY DATES
34 13 04 N	CLASS A	DATA 11-01-96
81 51 41 W	Current rules spacings	SEARCH 11-19-96
----- CHANNEL 231 - 94.1 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
ALOPEN	231A	Cross Hill	SC	0.0	0.00	114.5	-114.50 *
WMUUFM	233C	Greenville	SC	327.8	94.82	94.5	0.32 <
WGOR	230C3	Martinez	GA	193.7	89.00	88.5	0.50 <
AP232	232A	Forest Acres	SC	110.9	79.41	71.5	7.91
AP232	232A	Forest Acres	SC	107.5	79.97	71.5	8.47
AP232	232A	Forest Acres	SC	107.5	79.97	71.5	8.47
AP232	232A	Forest Acres	SC	107.5	79.97	71.5	8.47
WSTR	231C	Smyrna	GA	257.5	234.16	225.5	8.66
AP232	232A	Forest Acres	SC	117.9	81.01	71.5	9.51
AP232	232A	Forest Acres	SC	117.9	81.01	71.5	9.51
AP232	232A	Forest Acres	SC	107.3	81.12	71.5	9.62
AP232	232A	Forest Acres	SC	103.1	81.40	71.5	9.90
AP232	232A	Forest Acres	SC	106.8	81.85	71.5	10.35
AP232	232A	Forest Acres	SC	103.6	81.96	71.5	10.46
AP232	232A	Forest Acres	SC	103.6	81.96	71.5	10.46
WWGL	231C	Lexington	NC	37.2	236.63	225.5	11.13
ALOPEN	232A	Forest Acres	SC	105.3	83.36	71.5	11.86
AP232	232A	Forest Acres	SC	102.3	83.49	71.5	11.99
AP232	232A	Forest Acres	SC	102.3	83.49	71.5	11.99
AP232	232A	Forest Acres	SC	109.1	84.32	71.5	12.82
AP232	232A	Forest Acres	SC	107.5	86.66	71.5	15.16
AP232	232A	Forest Acres	SC	110.7	86.68	71.5	15.18
AP232	232A	Forest Acres	SC	109.3	88.31	71.5	16.81
AP232	232A	Forest Acres	SC	110.1	88.75	71.5	17.25
WCHYFM	231C	Savannah	GA	168.8	244.68	225.5	19.18
WFBCFM	229C	Greenville	SC	325.5	120.26	94.5	25.76
AD232	232A	Thomson	GA	216.8	105.28	71.5	33.78
WPUBFM	232A	Camden	SC	89.6	108.97	71.5	37.47
WQKIFM	230A	St. Matthews	SC	124.7	119.74	71.5	48.24
WQKIFM	230A	St. Matthews	SC	124.7	119.74	71.5	48.24
WARQ	228A	Columbia	SC	107.5	79.97	30.5	49.47

Predicted Signal Contours:

34 13 04 - CITY-GRADE CONTOUR FROM REFERENCE COORDINATES  
 81 51 41 - CROSS HILL, SOUTH CAROLINA

ERP = 6 kW, 7.782 dBk FM - 2-6 Tables

Radial	HAAT	kW	dBk	Field	70 dBu.5
-----					
305 Degr.	76.0M	6.000	7.782	1.000	13.9
306 Degr.	75.0M	6.000	7.782	1.000	13.8
307 Degr.	73.7M	6.000	7.782	1.000	13.7
308 Degr.	72.6M	6.000	7.782	1.000	13.6
309 Degr.	72.0M	6.000	7.782	1.000	13.6
310 Degr.	71.9M	6.000	7.782	1.000	13.6
311 Degr.	72.3M	6.000	7.782	1.000	13.6
312 Degr.	73.3M	6.000	7.782	1.000	13.7
313 Degr.	74.9M	6.000	7.782	1.000	13.8
314 Degr.	76.5M	6.000	7.782	1.000	14.0
315 Degr.	78.0M	6.000	7.782	1.000	14.1
316 Degr.	78.9M	6.000	7.782	1.000	14.2
317 Degr.	79.5M	6.000	7.782	1.000	14.2
318 Degr.	80.1M	6.000	7.782	1.000	14.3
319 Degr.	81.3M	6.000	7.782	1.000	14.4
320 Degr.	83.0M	6.000	7.782	1.000	14.5
321 Degr.	84.9M	6.000	7.782	1.000	14.7
322 Degr.	86.7M	6.000	7.782	1.000	14.9
323 Degr.	88.0M	6.000	7.782	1.000	15.0
324 Degr.	88.6M	6.000	7.782	1.000	15.1
325 Degr.	88.3M	6.000	7.782	1.000	15.0

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 Ant. COR= 240.5M AMSL



Predicted Signal Contours:

34 12 56 - CITY-GRADE CONTOUR FROM CPA SITE  
81 52 18 - CROSS HILL, SOUTH CAROLINA

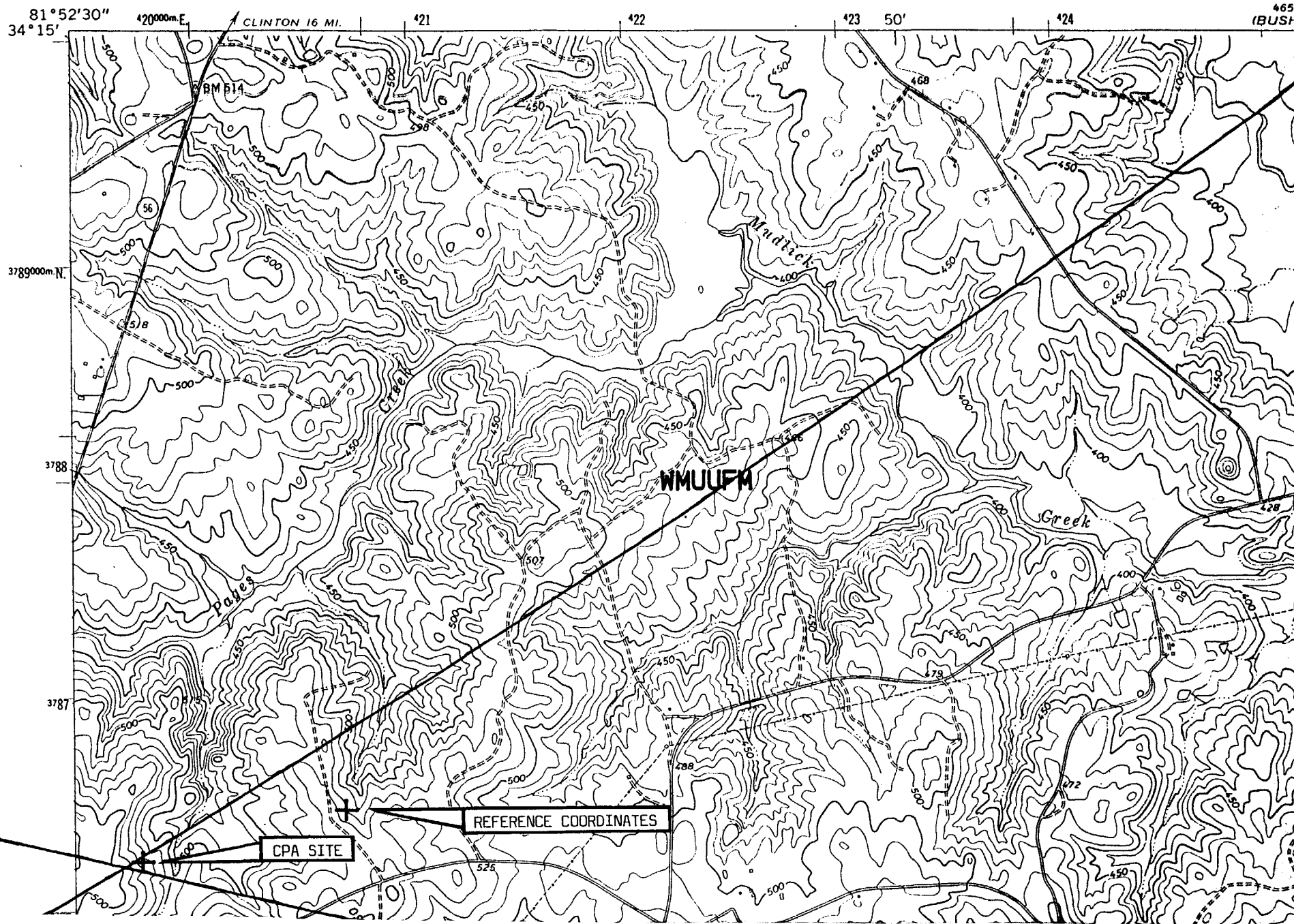
ERP = 6 kW, 7.782 dBk FM - 2-6 Tables

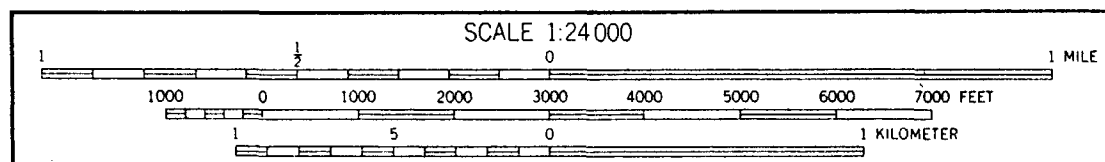
Radial	HAAT	kW	dBk	Field	70 dBu.5
305 Degr.	75.7M	6.000	7.782	1.000	13.9
306 Degr.	75.2M	6.000	7.782	1.000	13.9
307 Degr.	74.5M	6.000	7.782	1.000	13.8
308 Degr.	73.4M	6.000	7.782	1.000	13.7
309 Degr.	72.0M	6.000	7.782	1.000	13.6
310 Degr.	70.7M	6.000	7.782	1.000	13.5
311 Degr.	69.7M	6.000	7.782	1.000	13.4
312 Degr.	69.2M	6.000	7.782	1.000	13.3
313 Degr.	69.0M	6.000	7.782	1.000	13.3
314 Degr.	68.9M	6.000	7.782	1.000	13.3
315 Degr.	69.4M	6.000	7.782	1.000	13.4
316 Degr.	70.3M	6.000	7.782	1.000	13.4
317 Degr.	71.8M	6.000	7.782	1.000	13.6
318 Degr.	73.5M	6.000	7.782	1.000	13.7
319 Degr.	75.1M	6.000	7.782	1.000	13.8
320 Degr.	76.3M	6.000	7.782	1.000	13.9
321 Degr.	77.3M	6.000	7.782	1.000	14.0
322 Degr.	78.4M	6.000	7.782	1.000	14.1
323 Degr.	80.0M	6.000	7.782	1.000	14.3
324 Degr.	82.1M	6.000	7.782	1.000	14.5
325 Degr.	84.4M	6.000	7.782	1.000	14.7

Ant. COR= 240.6M AMSL

4432 IV SW  
(CROSS HILL)

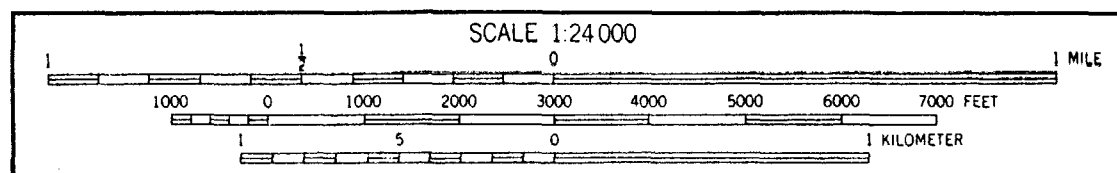
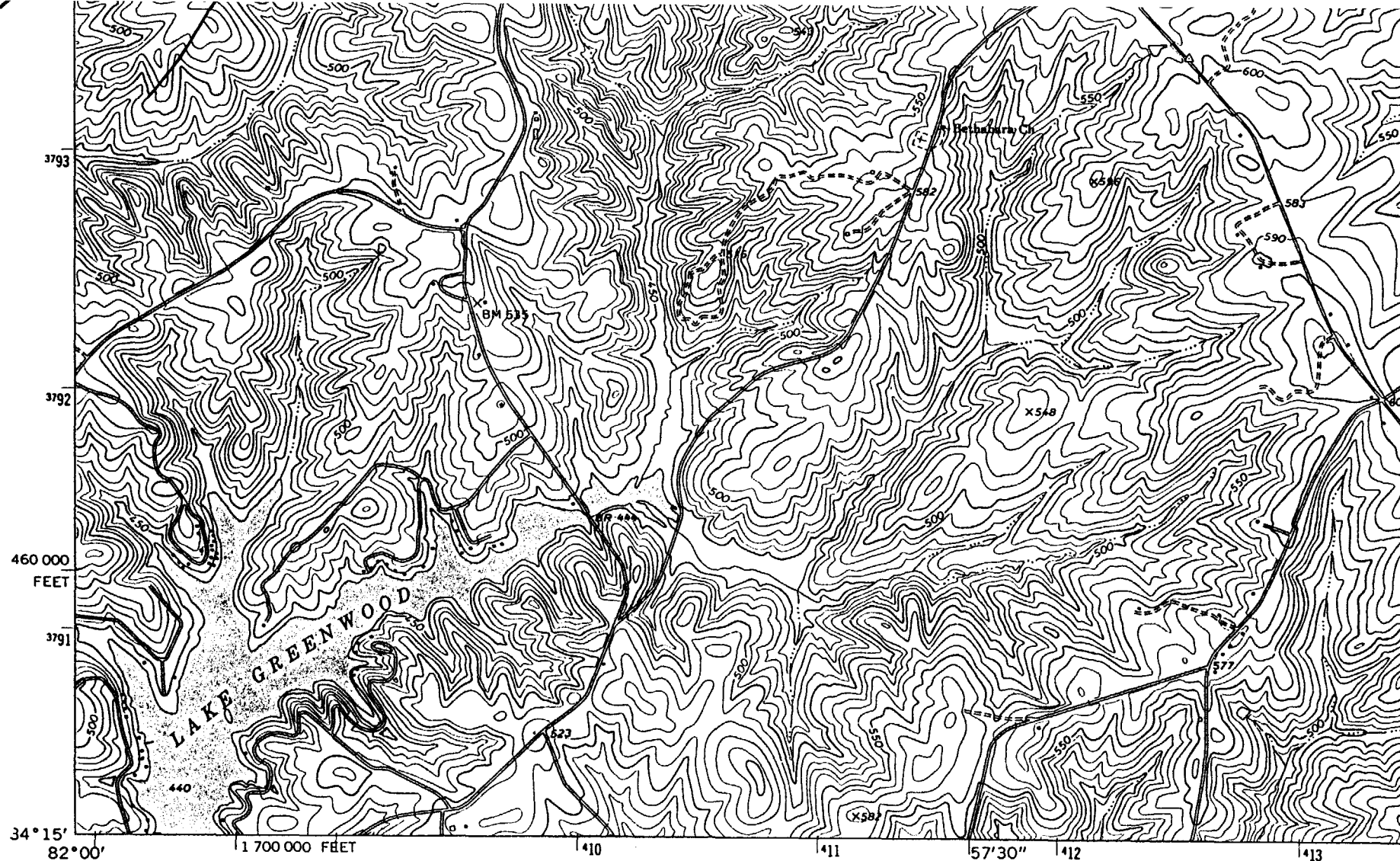
UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY





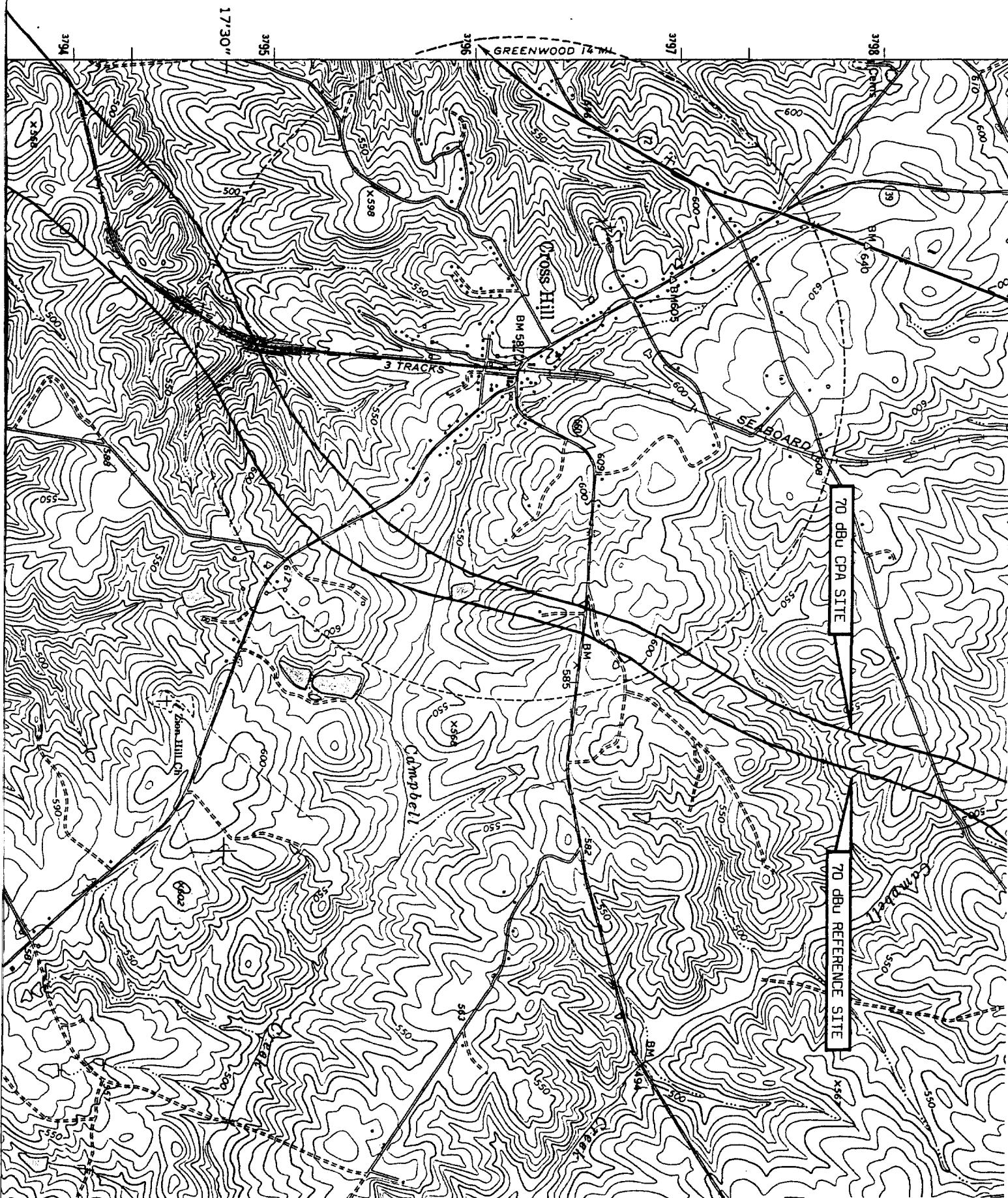
**WILLIAM CULPEPPER & ASSOCIATES, INC.**  
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FIGURE 1
USEABLE AREA MAP
SOUTH CAROLINA COMEX CROSS HILL, SOUTH CAROLINA



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**FIGURE 2**  
**MAP OF CITY AND 70 dBu CONTOURS**  
**SOUTH CAROLINA COMEX**  
**CROSS HILL, SOUTH CAROLINA**



**CERTIFICATE OF SERVICE**

I, Pamela R. McKethan, hereby certify that on this 20th day of November, 1996, a copy of the foregoing **PETITION FOR RULE MAKING TO DELETE ALLOTMENT** was hand-delivered to:

John A. Karousos  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
2000 M Street, N.W., Room 554  
Washington, D.C. 20554

A handwritten signature in cursive script, appearing to read "Pamela McKethan", written over a horizontal line.

Pamela R. McKethan

**HAND DELIVERED**